

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

AMERICAN PATENTS LLC,

Plaintiff,

v.

TELIT COMMUNICATIONS PLC AND
TELIT WIRELESS SOLUTIONS HONG
KONG LIMITED,

Defendants.

Civil Action No. 6:21-cv-01336-ADA

DECLARATION OF LIOR BEN EZER IN SUPPORT OF:

**TELIT COMMUNICATIONS LTD'S AND TELIT WIRELESS
SOLUTIONS HONG KONG LIMITED'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION, OR IN THE ALTERNATIVE FOR
FAILURE TO STATE A CLAIM OF DIRECT AND INDIRECT
INFRINGEMENT**

1. I, Lior Ben Ezer declare under penalty of perjury as follows:

2. I am Director of Finance and Accounting of Telit IoT Solutions Holdings Ltd.

beginning in September 2021. Telit IoT Solutions Holding Ltd. is the ultimate parent of the Telit Wireless Solutions Hong Kong Ltd. and Telit Communications Ltd.

3. In May 2019 I joined Telit Communications PLC ("Telit UK") as Corporate Controller. I was then promoted to Director of Finance and Accounting for Telit UK in November 2020.

4. I make this declaration based on my own knowledge and further based on information provided to me.

5. As the result of a corporate restructuring, Telit UK was renamed Telit Communications Ltd., and was re-registered as a private company, effective September 2021.

6. Telit UK was headquartered in London and was incorporated in the United Kingdom.

7. Telit UK did not manufacture any product.

8. Telit UK did not have any employees, offices, bank accounts or agent for service, and does not own any real estate in Texas, or elsewhere in the U.S.

9. There is a Telit company in North Carolina, Telit IoT Solutions, Inc. (formerly Telit Wireless Solutions, Inc.) that is responsible for sales in the U.S., which is a subsidiary of Telit IoT Limited.

10. From January 2016 until September 2021, Telit UK sold a few sample products to its subsidiary Telit Wireless Solutions, Inc., in North Carolina, and in 2016 made a single shipment of some modules to a customer in Florida.

11. Together those sales represented less than 0.02% of Telit Wireless Solutions, Inc.'s U.S. sales during that period.

12. Other than the shipments described above, Telit UK did not sell, offer for sale, or imported any products in, or into, the U.S.

13. Telit Communications Ltd. has not shipped any products into the U.S.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 26, 2022